

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

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UNITED STATES OF AMERICA,

Plaintiff,

-vs-

TIMATRESS TENAKA CADE,
a/k/a Timatress Tenaka Barnes,
a/k/a Tenaka Barnes,

Defendant.

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY Nancy Hox, DEPUTY

No. _____

Violations: 18 U.S.C. § 1343
18 U.S.C. § 1014
42 U.S.C. § 408(a)(7)(B)

INDICTMENT

The Federal Grand Jury charges:

Introduction

At all times relevant to this Indictment:

1. Consumer reporting agencies, or CRAs, are businesses that collect and aggregate credit information about individuals into credit reports, which are used by banks, credit unions, credit card issuers, and other lenders for the purpose of evaluating the credit-worthiness of a prospective borrower. TransUnion LLC ("TransUnion") and Experian Information Solutions, Inc. ("Experian") are two of the largest CRAs in the United States.

2. CRAs like TransUnion and Experian prepare credit reports by collecting tradelines, or detailed information regarding each line of credit extended to a particular

borrower, such as payment history, balance information, available credit limit, and length of credit history. CRAs use this tradeline information to generate a credit score for a borrower based upon a statistical evaluation of the borrower's credit history and credit risk.

3. CRAs prepare credit reports for an individual by using the individual's unique personal identifiers, including the individual's Social Security Number (SSN), a unique nine-digit number assigned to an individual by the Commissioner of Social Security. SSNs are typically assigned to an individual at birth.

4. CRAs generate credit reports and credit scores for an individual only when the individual applies for credit. As a result, young children who have had no reason to apply for credit generally have no credit history and no credit report.

5. Real, misappropriated SSNs, often assigned to children, are stolen and sold online as "credit profile numbers," "credit privacy numbers," or "credit protection numbers" (collectively "CPNs"). CPNs are marketed to individuals who have a poor credit history as a way to obtain credit cards, loans, and other lines of credit for which they would not otherwise qualify.

6. Purchasers of a CPN can thereafter attach their name to the misappropriated SSN to create a fraudulent credit profile with the CRAs. Once the fraudulent credit profile is established, a good credit history can be created by "pollinating" the credit profile with tradelines. For example, a common way to obtain a tradeline is to add an

individual who has a misappropriated SSN as an authorized user on an existing credit card with a good payment history. Once the fraudulent credit profile is pollinated with a few positive tradelines, the misappropriated SSN is used to obtain additional credit.

7. The Commissioner of Social Security assigned the SSN XXX-XX-4320 to a child born in 2006.

8. The Commissioner of Social Security assigned the SSN XXX-XX-0955 to a child born in 2009.

COUNTS 1-3
(Wire fraud)

9. The Federal Grand Jury incorporates Paragraphs 1 through 8 by reference.

The Scheme to Defraud

10. Beginning no later than October 2015 and continuing through at least August 2016, **TIMATRESS TENAKA CADE** devised and intended to devise a scheme to defraud banks, credit unions, retailers, and other lenders in a material manner, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, through the use of CPNs.

Purpose of the Scheme

11. It was the purpose of the scheme that **CADE** used CPNs to misrepresent her SSN to banks, credit unions, credit card issuers, retailers, and other lenders in order to represent to lenders that she had a credit history more favorable than she had actually

earned for purposes of obtaining loans for personal expenses, vehicles, and other merchandise.

Manner and Means

12. It was part of the scheme that:

a. **CADE** obtained a CPN, which was actually a misappropriated SSN.

In particular, **CADE** obtained the following SSNs, which the Commissioner of Social Security had previously issued to children born in 2006 and 2009: XXX-XX-0955 and XXX-XX-4320.

b. **CADE** caused CRAs to create fraudulent credit profiles using her name and the misappropriated SSNs.

c. **CADE** caused CRAs to attach tradelines to the fraudulent credit profiles in order to establish a good credit history for those credit profiles.

d. **CADE** thereafter used the misappropriated SSNs to submit materially false and fraudulent loan applications to banks, credit unions, credit card issuers, retailers, and other lenders in order to purchase vehicles and other merchandise.

e. Using the misappropriated SSNs, lenders electronically contacted CRAs to obtain credit reports purportedly associated with **CADE**.

f. Lenders thereafter issued credit to **CADE** believing that her credit history was different than it actually was.

g. CADE obtained personal loans, as well as a vehicle and other merchandise purchased on credit, and thereafter made little to no payments on the credit accounts, causing losses to the lenders.

Executions of the Scheme

13. On or about each of the dates set forth below, in the Western District of Oklahoma and elsewhere,

-----**TIMATRESS TENAKA CADE,**
a/k/a Timatress Tenaka Barnes,
a/k/a Tenaka Barnes,-----

the defendant herein, for the purpose of executing the above-described scheme to defraud, caused signals to be transmitted by means of wire communications in interstate commerce:

Count	Date	Lender	Description
1	10/01/15	Conn's HomePlus (d/b/a Conn's)	CADE submitted an online application requesting financing for \$10,276.48 in merchandise from Conn's. CADE falsely represented XXX-XX-4320 as her SSN.
2	06/15/16	Synchrony Financial	CADE submitted an online application requesting a Walmart credit card with an \$800.00 credit limit. CADE falsely represented XXX-XX-0955 as her SSN.
3	06/15/16	Synchrony Financial	CADE submitted an online application requesting an Amazon credit card with a \$2,200.00 credit limit. CADE falsely represented XXX-XX-0955 as her SSN.

All in violation of Title 18, United States Code, Section 1343.

COUNT 4
(False Statement to a Financial Institution)

14. On or about October 2, 2015, in the Western District of Oklahoma,

-----**TIMATRESS TENAKA CADE,**
a/k/a Timatress Tenaka Barnes,
a/k/a Tenaka Barnes,-----

the defendant herein, knowingly made a false statement to Tinker Federal Credit Union (TFCU), a financial institution, the deposits of which were insured by the National Credit Union Administration, for the purpose of influencing TFCU to approve a personal loan in the amount of \$3,000.00 for wedding expenses. Specifically, in order to conceal her true credit history from TFCU, **CADE** submitted a loan application in which she used an SSN which she knew was not assigned to her by the Commissioner of Social Security. **CADE** also falsely stated that she was employed at Mr. Ralph Clothing with an annual salary of \$51,600.00.

All in violation of Title 18, United States Code, Section 1014.

COUNT 5
(False Statement to a Financial Institution)

15. On or about October 8, 2015, in the Western District of Oklahoma,

-----**TIMATRESS TENAKA CADE,**
a/k/a Timatress Tenaka Barnes,
a/k/a Tenaka Barnes,-----

the defendant herein, knowingly made a false statement to BBVA Compass Bank, a financial institution, the deposits of which were federally insured by the Federal Deposit

Insurance Corporation, for the purpose of influencing BBVA Compass Bank to approve an auto loan in the amount of \$27,076.00. Specifically, in order to conceal her true credit history from BBVA Compass Bank, **CADE** submitted a loan application in which she used an SSN which she knew was not assigned to her by the Commissioner of Social Security. In support of the loan application to BBVA Compass Bank, **CADE** also falsely stated that she was employed at Mr. Ralph Clothing with gross monthly earnings of \$4,300.00.

All in violation of Title 18, United States Code, Section 1014.

COUNTS 6-10
(False Representation of Social Security Number)

16. On or about the dates set forth below, in the Western District of Oklahoma,

-----**TIMATRESS TENAKA CADE,**
a/k/a Timatress Tenaka Barnes,
a/k/a Tenaka Barnes,-----

the defendant herein, knowingly and with intent to deceive, falsely represented to Conn's HomePlus, in applications for retail installment loans, an SSN, as listed below, to be her SSN, well knowing that number was not the SSN assigned to her by the Commissioner of Social Security:

Count	Date of Loan Application	Amount of Loan	Products Financed	False SSN Used
6	10/01/2015	\$10,276.48	Household furnishings 65-inch Television	XXX-XX-4320
7	10/01/2015	\$2,282.40	Household furnishings	XXX-XX-4320
8	10/12/2015	\$6,131.84	75-inch Television	XXX-XX-4320
9	06/19/2016	\$13,718.40	Washer & dryer 65-inch Television 50-inch Television Weber Gas Grill Vacuum HP Envy Notebook	XXX-XX-0955
10	06/22/2016	\$987.12	Household furnishings	XXX-XX-0955

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT 11

(False Representation of Social Security Number)

17. On or about August 4, 2016, in the Western District of Oklahoma,

-----**TIMATRESS TENAKA CADE,**
a/k/a Timatress Tenaka Barnes,
a/k/a Tenaka Barnes,-----

the defendant herein, knowingly and with intent to deceive, falsely represented to OKC Homes 4 You, in a home rental application for a residence located at 16108 Wind Crest Way, Edmond, Oklahoma, that her SSN was XXX-XX-0955, well knowing that number was not the SSN assigned to her by the Commissioner of Social Security.


All in violation of Title 42, United States Code, Section 408(a)(7)(B).

A TRUE BILL:

A handwritten signature in black ink, appearing to read "Jvette Morris".

FOREPERSON OF THE GRAND JURY

MARK A. YANCEY
United States Attorney

A handwritten signature in blue ink, appearing to read "Jessica L. Perry".

JESSICA L. PERRY
Assistant U.S. Attorney